

JOSHUA A. SLIKER, ESQ.
Nevada Bar No. 12493
HOLLY E. WALKER, ESQ.
Nevada Bar No. 14295
JACKSON LEWIS P.C.
300 S. Fourth Street, Ste. 900
Las Vegas, Nevada 89101
Telephone: (702) 921-2460
Facsimile: (702) 921-2461
E-Mail: joshua.sliker@jacksonlewis.com
E-Mail: holly.walker@jacksonlewis.com

*Attorneys for Plaintiff Elko, Inc.
d/b/a Coach USA (NV)*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

ELKO, INC., a Wyoming corporation,
Plaintiff,

v.

COREY PETERS, an individual; WYNNE
TRANSPORTATION HOLDINGS, LLC, a
Delaware limited liability company,
Defendants.

Case No.: 3:22-cv-00015-MMD-CLB

**STIPULATION AND ORDER TO
EXTEND TIME FOR PLAINTIFF TO
FILE REPLIES IN SUPPORT OF ITS
MOTIONS FOR LEAVE TO FILE
AMENDED COMPLAINT AND TO
CONDUCT JURISDICTIONAL
DISCOVERY (ECF Nos. 59, 60)**

(FIRST REQUEST)

Plaintiff Elko, Inc. d/b/a Coach USA (NV) (“Plaintiff” or “Coach Elko”), and Defendants Corey Peters (“Peters”) and Wynne Transportation Holdings, LLC (“WTH”), by and through their respective counsel of record, hereby stipulate and agree that Plaintiff shall have an extension up to and including June 13, 2022, in which to file its replies in support of its Motions for Leave to File Amended Complaint and to Conduct Jurisdictional Discovery (ECF Nos. 59, 60). This Stipulation is submitted and based upon the following:

1. Plaintiff’s First Amended Complaint was filed on April 11, 2022. ECF No. 51. Peters filed his Answer to Plaintiff’s First Amended Complaint on April 25, 2022. ECF No. 52.
2. WTH filed its Motion to Dismiss Plaintiff’s First Amended Complaint (“Motion to Dismiss”) on April 25, 2022. ECF No. 53.

1 3. Plaintiff filed its opposition to WTH's Motion to Dismiss on May 16, 2022. ECF
2 No. 58. In the alternative, Plaintiff also filed its Motions for Leave to File Amended Complaint and
3 to Conduct Jurisdictional Discovery. ECF Nos. 59, 60.

4 4. WTH filed its reply in support of its Motion to Dismiss and its opposition to
5 Plaintiff's Motions for Leave to File Amended Complaint and to Conduct Jurisdictional Discovery
6 on May 30, 2022. ECF No. 63.

7 5. Plaintiff's replies in support of its Motions for Leave to File Amended Complaint
8 and to Conduct Jurisdictional Discovery are currently due on June 6, 2022. Plaintiff's counsel has
9 had to address other matters, including attending three depositions scheduled from June 1, 2022
10 through June 3, 2022 for another case. Due to this and the recent holiday weekend, the parties have
11 agreed to extend the time for Plaintiff to file its replies by seven (7) days, up to and including **June**
12 **13, 2022.**

13 6. This is the first request for an extension of time for Plaintiff to file its replies in
14 support of its Motions for Leave to File Amended Complaint and to Conduct Jurisdictional
15 Discovery.

16 7. This request is made in good faith and not for the purpose of delay.

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8. Nothing in this Stipulation, nor the fact of entering to the same, shall have the effect of or be construed as waiving any claim or defense held by any party hereto.

DATED this 3rd day of June, 2022.

JACKSON LEWIS P.C.

NAYLOR & BRASTER

/s/ Holly E. Walker

/s/ John M. Naylor

JOSHUA A. SLIKER, ESQ.

JOHN M. NAYLOR, ESQ.

Nevada Bar No. 12493

Nevada Bar No. 5435

HOLLY E. WALKER, ESQ.

BENJAMIN B. GORDON, ESQ.

Nevada Bar No. 14295

Nevada Bar No. 15552

300 S. Fourth Street, Suite 900

1050 Indigo Drive, Suite 200

Las Vegas, Nevada 89101

Las Vegas, NV 89145

Attorneys for Plaintiff Elko, Inc.

Attorneys for Defendant Corey Peters

HOLLAND & HART LLP

/s/ Jon T. Pearson

GREGORY S. GILBERT, ESQ.

Nevada Bar No. 6310

JON T. PEARSON, ESQ.

Nevada Bar No. 10182

BRIAN D. DOWNING, ESQ.

Nevada Bar No. 14510

9555 Hillwood Drive, 2nd Floor

Las Vegas, Nevada 89134

Attorneys for Defendant Wynne Transportation Holdings, LLC

ORDER

IT IS SO ORDERED June 3, 2022.



U.S. District Judge